

EXHIBIT A

CPRA request (LVBID.2017.04.16.a)

From: adrian@mailingaddress.org
To: erin.dolan@dolanknight.com, tom@metropolitanholding.com, heather@h-rpr.com
Subject: CPRA request (LVBID.2017.04.16.a)
Date: Sunday, April 16, 2017 7:41 PM
Size: 2 KB

Good evening, LVBID.

I'd like to inspect the following material:

1. Emails between anyone at the Larchmont Village BID, staff or board, and anyone at either lacity.org or lapd.online from between January 1, 2016 and March 31, 2017. Here "between" means to, from, cc, or bcc. I need to see these emails in some kind of native format, which means eml, msg, mbox, or pst exclusively. I will also need to see the attachments in their native formats, although they will be included automatically if the emails are exported to any of the formats listed. Please note that the html format in which you've previously sent me emails is not a native email format, does not produce copies of the records, and is not acceptable. If it will speed up your production, PDFs with the attachments embedded are a reasonable compromise to make. If you have questions on this, please let me know.

2. I recently asked you for copies of the minutes of your board meetings on October 13, 2014, October 15, 2015 and October 12, 2016. According to your attorney you are unable to locate these minutes. The California Corporations Code at section 1500 requires your organization's minutes to be "kept either in written form or in another form capable of being converted into clearly legible tangible form." Since you don't have them in written form, I'm assuming you have them "in another form capable of being converted" into written form. I would like to inspect copies of the minutes of these three meetings in that form, whatever it might be.

3. A copy of the contract with the BID consultant you all used for your most recent renewal process, if you used a consultant.

Thanks for your cooperation,

Adrian Riskin

CPRA request (LVBID.2017.04.17.a)

From: adrian@mailingaddress.org
To: erin.dolan@dolanknight.com, [Tom Kneafsey <tom@metropolitanholding.com>](mailto:Tom.Kneafsey@metropolitanholding.com),
[Heather Boylston <heather@h-rpr.com>](mailto:Heather.Boylston@h-rpr.com)
Subject: CPRA request (LVBID.2017.04.17.a)
Date: Monday, April 17, 2017 6:56 AM
Size: 1 KB

Good morning, Larchmont Village.

I'd like to obtain copies in their native electronic format of the following material:

1. Agendas for all meetings of the LVBID Board and its committees, if any, from January 1, 2014 through the present. These should be copies of the agendas you posted outside your principal office 72 hours in advance of the meetings or 24 hours in advance of meetings called special.
2. All emails between anyone at the BID, staff or Board member, from October 2016, that relates to the October 2016 Board meeting. If it's feasible to search for this specific topic, and if there aren't too many of these emails, I'd like to see all emails that relate to the operations of the BID from October 2016.

Thanks for your cooperation,

Adrian Riskin

CPRA request (LVBID.2017.05.02.a)

From: adrian@mailingaddress.org
To: [Heather Boylston <heather@h-rpr.com>](mailto:heather@h-rpr.com), [Tom Kneafsey <tom@metropolitanholding.com>](mailto:tom@metropolitanholding.com)
Subject: CPRA request (LVBID.2017.05.02.a)
Date: Tuesday, May 02, 2017 8:26 PM
Size: 924 B

Good evening, LVBID friends.

Can you please send me electronic copies of all material distributed at your meeting this morning? Also, can you please send them immediately as required by CPRA? As I'm sure you're aware, that 10 day reply deadline in CPRA is meant for collecting records and deciding whether they're exempt. These aren't exempt by definition and you all almost certainly have them in one place already.

Thanks,

Adrian

EXHIBIT B

Re: CPRA request (LVBID.2017.04.16.a)

From: adrian@mailingaddress.org
To: erin.dolan@dolanknight.com, tom@metropolitanholding.com, heather@h-rpr.com
Subject: Re: CPRA request (LVBID.2017.04.16.a)
Date: Tuesday, May 02, 2017 8:28 PM
Size: 3 KB

Good evening, LVBID friends.

Is there any news on this request? As I'm sure you're aware, the law requires you all to have responded by April 26.

Thanks for your help,

Adrian

On Sun, Apr 16, 2017, at 07:41 PM, adrian@mailingaddress.org wrote:

Good evening, LVBID.

I'd like to inspect the following material:

1. Emails between anyone at the Larchmont Village BID, staff or board, and anyone at either lacity.org or lapd.online from between January 1, 2016 and March 31, 2017. Here "between" means to, from, cc, or bcc. I need to see these emails in some kind of native format, which means eml, msg, mbox, or pst exclusively. I will also need to see the attachments in their native formats, although they will be included automatically if the emails are exported to any of the formats listed. Please note that the html format in which you've previously sent me emails is not a native email format, does not produce copies of the records, and is not acceptable. If it will speed up your production, PDFs with the attachments embedded are a reasonable compromise to make. If you have questions on this, please let me know.

2. I recently asked you for copies of the minutes of your board meetings on October 13, 2014, October 15, 2015 and October 12, 2016. According to your attorney you are unable to locate these minutes. The California Corporations Code at section 1500 requires your organization's minutes to be "kept either in written form or in another form capable of being converted into clearly legible tangible form." Since you don't have them in written form, I'm assuming you have them "in another form capable of being converted" into written form. I would like to inspect copies of the minutes of these three meetings in that form, whatever it might be.

3. A copy of the contract with the BID consultant you all used for your most recent renewal process, if you used a consultant.

Thanks for your cooperation,

Adrian Riskin

Re: CPRA request (LVBID.2017.04.16.a)

From: adrian@mailingaddress.org
To: tom@metropolitanholding.com, heather@h-rpr.com, rebecca@h-rpr.com,
[J. Thomas Cairns, Jr. <jtcairns@swesq.com>](mailto:J.Thomas.Cairns,Jr.<jtcairns@swesq.com>)
Subject: Re: CPRA request (LVBID.2017.04.16.a)
Date: Thursday, May 11, 2017 7:13 AM
Size: 3 KB

Good morning, LVBID!

Is there any news on this request? A response was due on April 26.

Thanks,

Adrian

On Tue, May 2, 2017, at 08:28 PM, adrian@mailingaddress.org wrote:

Good evening, LVBID friends.

Is there any news on this request? As I'm sure you're aware, the law requires you all to have responded by April 26.

Thanks for your help,

Adrian

On Sun, Apr 16, 2017, at 07:41 PM, adrian@mailingaddress.org wrote:

Good evening, LVBID.

I'd like to inspect the following material:

1. Emails between anyone at the Larchmont Village BID, staff or board, and anyone at either lacity.org or lapd.online from between January 1, 2016 and March 31, 2017. Here "between" means to, from, cc, or bcc. I need to see these emails in some kind of native format, which means eml, msg, mbox, or pst exclusively. I will also need to see the attachments in their native formats, although they will be included automatically if the emails are exported to any of the formats listed. Please note that the html format in which you've previously sent me emails is not a native email format, does not produce copies of the records, and is not acceptable. If it will speed up your production, PDFs with the attachments embedded are a reasonable compromise to make. If you have questions on this, please let me know.

2. I recently asked you for copies of the minutes of your board meetings on October 13, 2014, October 15, 2015 and October 12, 2016. According to your attorney you are unable to locate these minutes. The California Corporations Code at section 1500 requires your organization's minutes to be "kept either in written form or in another form capable of being converted into clearly legible tangible form." Since you don't have them in written form, I'm assuming you have them "in another form capable of being converted" into written form. I would like to inspect copies of the minutes of these three meetings in that form, whatever it might be.

3. A copy of the contract with the BID consultant you all used for your most recent renewal process, if you used a consultant.

2/16/2018

Re: CPRA request (LVBID.2017.04.16.a) | FastMail

Thanks for your cooperation,

Adrian Riskin

Re: CPRA request (LVBID.2017.04.16.a LVBID.2017.04.17.a LVBID.2017.05.02.a)

From: adrian@mailingaddress.org
To: [Heather Boylston <heather@h-rpr.com>](mailto:heather@h-rpr.com), [Tom Kneafsey <tom@metropolitanholding.com>](mailto:tom@metropolitanholding.com),
[J. Thomas Cairns, Jr. <jtcairns@swesq.com>](mailto:jtcairns@swesq.com), rebecca@h-rpr.com, info@larchmontvillagebid.com,
[Heather Boylston <heather@larchmontvillagebid.com>](mailto:heather@larchmontvillagebid.com)
Subject: Re: CPRA request (LVBID.2017.04.16.a LVBID.2017.04.17.a LVBID.2017.05.02.a)
Date: Saturday, February 17, 2018 3:33 PM
Size: 1 KB

Good afternoon, LVBID.

Last year I sent you CPRA requests on the following dates:

1. April 16, 2017
2. April 17, 2017
3. May 2, 2017

To date I have not received any response to these requests. Please let me know their status as soon as possible.

Thanks,

Adrian Riskin

Re: CPRA request (LVBID.2017.04.17.a)

From: adrian@mailingaddress.org
To: erin.dolan@dolanknight.com, Tom Kneafsey <tom@metropolitanholding.com>, Heather Boylston <heather@h-rpr.com>, Heather Boylston <heather@larchmontvillagebid.com>
Subject: Re: CPRA request (LVBID.2017.04.17.a)
Date: Friday, April 28, 2017 5:07 PM
Size: 3 KB

Greetings, long incommunicado LVBID friends!

Is there any news on this request? An initial response was due yesterday.

Also, I notice from an email recently sent to me by Heather D. Boylston with an attached agenda that at least some of you BID-folks use Outlook.

If it would make it easier for you to respond to this request in something approximating a timely manner, I would be willing to accept, rather than natively formatted copies of emails (eml, msg, mbox, or pst), the kind of PDF with embedded attachments that Outlook can produce, possibly in combination with some kind of Adobe software.

Nicole Shahenian, ED of your friendly neighbor to the Northeast, uses this to make copies of emails for me, and perhaps she'd be willing to help you get started with it if you don't know what I mean. Please note though, that as I said above, this PDF format is a compromise, and is only acceptable in lieu of actual copies of emails in the above-listed formats if its use will make the CPRA process significantly faster.

Thanks again for all your forthcoming help,

Adrian

On Mon, Apr 17, 2017, at 06:56 AM, adrian@mailingaddress.org wrote:

Good morning, Larchmont Village.

I'd like to obtain copies in their native electronic format of the following material:

1. Agendas for all meetings of the LVBID Board and its committees, if any, from January 1, 2014 through the present. These should be copies of the agendas you posted outside your principal office 72 hours in advance of the meetings or 24 hours in advance of meetings called special.
2. All emails between anyone at the BID, staff or Board member, from October 2016, that relates to the October 2016 Board meeting. If it's feasible to search for this specific topic, and if there aren't too many of these emails, I'd like to see all emails that relate to the operations of the BID from October 2016.

Thanks for your cooperation,

Adrian Riskin

Re: CPRA request (LVBID.2017.04.17.a)

From: adrian@mailingaddress.org
To: [Tom Kneafsey <tom@metropolitanholding.com>](mailto:tom@metropolitanholding.com), [Heather Boylston <heather@h-rpr.com>](mailto:heather@h-rpr.com),
[Heather Boylston <heather@larchmontvillagebid.com>](mailto:heather@larchmontvillagebid.com), rebecca@h-rpr.com,
[J. Thomas Cairns, Jr. <jtcairns@swesq.com>](mailto:jtcairns@swesq.com)
Subject: Re: CPRA request (LVBID.2017.04.17.a)
Date: Thursday, May 11, 2017 7:14 AM
Size: 3 KB

Good morning, LVBID.

Is there any news on this request? A response is now close to four weeks overdue.

thanks,

Adrian

On Fri, Apr 28, 2017, at 05:07 PM, adrian@mailingaddress.org wrote:

Greetings, long incommunicado LVBID friends!

Is there any news on this request? An initial response was due yesterday.

Also, I notice from an email recently sent to me by Heather D. Boylston with an attached agenda that at least some of you BID-folks use Outlook. If it would make it easier for you to respond to this request in something approximating a timely manner, I would be willing to accept, rather than natively formatted copies of emails (eml, msg, mbox, or pst), the kind of PDF with embedded attachments that Outlook can produce, possibly in combination with some kind of Adobe software.

Nicole Shahanian, ED of your friendly neighbor to the Northeast, uses this to make copies of emails for me, and perhaps she'd be willing to help you get started with it if you don't know what I mean. Please note though, that as I said above, this PDF format is a compromise, and is only acceptable in lieu of actual copies of emails in the above-listed formats if its use will make the CPRA process significantly faster.

Thanks again for all your forthcoming help,

Adrian

On Mon, Apr 17, 2017, at 06:56 AM, adrian@mailingaddress.org wrote:

Good morning, Larchmont Village.

I'd like to obtain copies in their native electronic format of the following material:

1. Agendas for all meetings of the LVBID Board and its committees, if any, from January 1, 2014 through the present. These should be copies of the agendas you posted outside your principal office 72 hours in advance of the meetings or 24 hours in advance of meetings called special.
2. All emails between anyone at the BID, staff or Board member, from October 2016, that relates to the October 2016 Board meeting. If it's

2/16/2018

Re: CPRA request (LVBID.2017.04.17.a) | FastMail

feasible to search for this specific topic, and if there aren't too many of these emails, I'd like to see all emails that relate to the operations of the BID from October 2016.

Thanks for your cooperation,

Adrian Riskin

Re: CPRA request (LVBID.2017.05.02.a)

From: adrian@mailingaddress.org
To: [Heather Boylston <heather@h-rpr.com>](mailto:heather@h-rpr.com), [Tom Kneafsey <tom@metropolitanholding.com>](mailto:tom@metropolitanholding.com),
[J. Thomas Cairns, Jr. <jtcairns@swesq.com>](mailto:jtcairns@swesq.com), rebecca@h-rpr.com
Subject: Re: CPRA request (LVBID.2017.05.02.a)
Date: Tuesday, May 30, 2017 4:06 PM
Size: 2 KB

Good afternoon, LVBID.

I am worried that perhaps you haven't understood something about the nature of this request or of the CPRA or the Brown Act. The Brown Act requires you to make the information I've requested here available at the actual meeting. Thus there's no question about whether or not it is exempt under the CPRA. It is not exempt due to an express provision of the Brown Act.

The CPRA requires you to make non-exempt information available promptly. The 10/24 days allowed for response are allowed only for the purpose of determining if the requested material exists and, if so, if it's exempt. Neither of those reasons for delay apply here. Thus you are required to have made this material available as soon as I requested it. Even if that were not the case, the longest conceivable deadline allowed by the CPRA under any circumstances whatsoever expired on Friday, May 26.

Please either send me copies immediately or let me know when I can come in to your office to look at them. Any time tomorrow or Thursday works for me.

thanks,

Adrian

On Tue, May 2, 2017, at 08:26 PM, adrian@mailingaddress.org wrote:

Good evening, LVBID friends.

Can you please send me electronic copies of all material distributed at your meeting this morning? Also, can you please send them immediately as required by CPRA? As I'm sure you're aware, that 10 day reply deadline in CPRA is meant for collecting records and deciding whether they're exempt. These aren't exempt by definition and you all almost certainly have them in one place already.

Thanks,

Adrian

EXHIBIT C

RE: CPRA request (LVBID.2017.04.17.a)

From: J. Thomas Cairns, Jr. <jtcairns@swesq.com>
To: adrian@mailingaddress.org, Tom Kneafsey <tom@metropolitanholding.com>, Heather Boylston <heather@h-rpr.com>, Heather Boylston <heather@larchmontvillagebid.com>, rebecca@h-rpr.com
Cc: Colleen Flynn <cflynnlaw@yahoo.com>
Subject: RE: CPRA request (LVBID.2017.04.17.a)
Date: Tuesday, May 16, 2017 11:53 AM
X-Delivered-To: adrian@mailingaddress.org
Size: 40 KB

Mr. Riskind,

The LVBID is currently reviewing your request and its records. We expect to respond further within the next 14 days.

Best Regards,
Tom Cairns



J. Thomas Cairns, Jr.
Senior Counsel

333 South Hope Street, 36th Floor
Los Angeles, CA 90071

T: (213) 229-2868
F: (213) 229-2870
W: www.swesq.com

This email communication may contain CONFIDENTIAL INFORMATION WHICH ALSO MAY BE LEGALLY PRIVILEGED and is intended only for the use of the intended recipients identified above. If you are not the intended recipient of this communication, you are hereby notified that any unauthorized review, use, dissemination, distribution, downloading, or copying of this communication is strictly prohibited. If you are not the intended recipient and have received this communication in error, please immediately notify us by reply email, delete the communication and destroy all copies.

IRS CIRCULAR 230 NOTICE: To ensure compliance with requirements imposed by the Internal Revenue Service, we inform you that any U.S. tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed in this communication (or in any attachment).

-----Original Message-----

From: adrian@mailingaddress.org [mailto:adrian@mailingaddress.org]
Sent: Thursday, May 11, 2017 7:14 AM
To: Tom Kneafsey <tom@metropolitanholding.com>; Heather Boylston <heather@h-rpr.com>; Heather Boylston <heather@larchmontvillagebid.com>; rebecca@h-rpr.com; J. Thomas Cairns, Jr. <jtcairns@swesq.com>
Subject: Re: CPRA request (LVBID.2017.04.17.a)

Good morning, LVBID.

Is there any news on this request? A response is now close to four weeks overdue.

thanks,

Adrian

On Fri, Apr 28, 2017, at 05:07 PM, adrian@mailingaddress.org wrote:

> Greetings, long incommunicado LVBID friends!
>
> Is there any news on this request? An initial response was due
> yesterday.
>
> Also, I notice from an email recently sent to me by Heather D.
> Boylston with an attached agenda that at least some of you BID-folks use Outlook.
> If it would make it easier for you to respond to this request in
> something approximating a timely manner, I would be willing to accept,
> rather than natively formatted copies of emails (eml, msg, mbox, or
> pst), the kind of PDF with embedded attachments that Outlook can
> produce, possibly in combination with some kind of Adobe software.
>
> Nicole Shahanian, ED of your friendly neighbor to the Northeast, uses
> this to make copies of emails for me, and perhaps she'd be willing to
> help you get started with it if you don't know what I mean. Please
> note though, that as I said above, this PDF format is a compromise,
> and is only acceptable in lieu of actual copies of emails in the
> above-listed formats if its use will make the CPRA process significantly faster.
>
> Thanks again for all your forthcoming help,
>
> Adrian
>
> On Mon, Apr 17, 2017, at 06:56 AM, adrian@mailingaddress.org wrote:
>> Good morning, Larchmont Village.
>>
>> I'd like to obtain copies in their native electronic format of the
>> following material:
>>
>> 1. Agendas for all meetings of the LVBID Board and its committees,
>> if any, from January 1, 2014 through the present. These should be
>> copies of the agendas you posted outside your principal office 72
>> hours in advance of the meetings or 24 hours in advance of meetings
>> called special.
>>
>> 2. All emails between anyone at the BID, staff or Board member, from
>> October 2016, that relates to the October 2016 Board meeting. If
>> it's feasible to search for this specific topic, and if there aren't
>> too many of these emails, I'd like to see all emails that relate to
>> the operations of the BID from October 2016.
>>
>> Thanks for your cooperation,
>>
>> Adrian Riskin
